

REMARKS

Claims 1-3, 5-15, and 17-33 will be pending upon entry of the present amendment. Claims 1, 9, and 15 were amended, claims 4 and 16 were cancelled, and claims 21-29 were added in an amendment filed on April 30, 2003. The present supplemental amendment adds new claims 30-33 and supplements the April 30 amendment.

New claims 30-33 are not anticipated or rendered obvious by the cited prior art. Claim 30 is directed to a method that includes forming a second insulating region (45) covering a second conductive layer (41) and forming third and fourth through regions (56, 57) simultaneously on first and second through regions (38, 39) after forming the second insulating region on the second conductive layer (the parenthetical references are included for exemplary purposes only and are not intended to limit the scope of the claim to any of the disclosed embodiments). No new matter is being presented.

None of the cited prior art teaches or suggest forming a second insulating region covering a second conductive layer and forming through the second insulating region third and fourth through regions simultaneously on first and second through regions after forming the second insulating region on the second conductive layer. Bandyopadhyay, Pasch, and Tsui all form a second insulating layer directly on the first insulating layer immediately after planarizing the first insulating layer, and thus, no second conductive region is formed. Jiang forms a capacitor electrode 48b directly on the plug 46, and thus neither of the plugs 60 is "aligned and in direct contact with the second through region." Moreover, claim 30 recites that the second conductive region does not directly contact either of the first and second through region, which is not satisfied by the capacitor electrode 48b.

Pasch, by itself or with any of the other cited references, also does not teach or suggest the invention recited in new claim 30. Pasch shows a conductive region 160 that is formed after the second insulating layer 150 is formed, and thus, is not covered by the second insulating layer 150. A third insulating layer 170 is formed on the conductive region 160, but the third insulating layer 170 cannot be the second insulating region recited in claim 30 because the plugs 152, 158 that contact the plugs 132, 142 are formed before the third insulating layer 170 is

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formed. In contrast, claim 30 recites that the third and fourth through regions extend through, and are formed after, the second insulating region.

For the foregoing reasons, claims 30-33 are not anticipated or rendered obvious by the cited prior art.

The Commissioner is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090.

All of the claims remaining in the application are now clearly allowable. Favorable consideration and a Notice of Allowance are earnestly solicited.

Respectfully submitted,

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